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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
KYLE LISMAN,  
  
Defendants.

CASE NO. 1:25-CR-00041-JLT-SKO

STIPULATION AND PROTECTIVE ORDER  
BETWEEN THE UNITED STATES AND  
DEFENDANT

WHEREAS, the discovery in this case is voluminous and contains a large amount of personal and confidential information including but not limited to dates of birth, telephone numbers, residential addresses, social security numbers and other confidential information ("Protected Information"); and

WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the unauthorized disclosure or dissemination of this information to anyone not a party to the court proceedings in this matter;

The parties agree that entry of a stipulated protective order is appropriate.

THEREFORE, Defendant KYLE LISMAN by and through their counsel of record ("Defense Counsel"), and the United States of America, by and through Assistant United States Attorney Jeffrey Spivak, hereby agree and stipulate as follows:

1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory authority.

2. This Order pertains to all discovery provided to or made available to Defense Counsel as

1 part of discovery in this case (hereafter, collectively known as “the discovery”).

2 3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any  
3 documents that contain Protected Information with anyone other than Defense Counsel attorneys,  
4 designated defense investigators, and support staff. Defense Counsel may permit the Defendant to view  
5 unredacted documents in the presence of his attorney, defense investigators, and support staff. The  
6 parties agree that Defense Counsel, defense investigators, and support staff shall not allow the  
7 Defendant to copy Protected Information contained in the discovery, except as agreed to by the United  
8 States of America (“Government”). The parties agree that Defense Counsel, defense investigators, and  
9 support staff may provide the Defendant with copies of documents from which Protected Information  
10 has been redacted.

11 4. To the extent possible, to alleviate the time burden associated with defense counsel  
12 redacting Protected Information to give defendant copies of discovery documents, the government will  
13 endeavor to identify categories of documents and/or Bates ranges of produced discovery documents that  
14 may be provided to the defendant for temporary review without redaction.

15 5. The discovery and information therein may be used only in connection with the litigation  
16 of this case and for no other purpose. The discovery is now and will forever remain the property of the  
17 Government. Defense Counsel will return the discovery to the Government or certify that it has been  
18 shredded at the conclusion of the case.

19 6. Defense Counsel will store the discovery in a secure place and will use reasonable care to  
20 ensure that it is not disclosed to third persons in violation of this agreement.

21 7. Defense Counsel shall be responsible for advising the Defendant, employees, and other  
22 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

23 8. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to  
24 withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by  
25 this Order.

26 IT IS SO STIPULATED.  
27  
28

1 Dated: March 20, 2025

MICHELE BECKWITH  
Acting United States Attorney

3 By: /s/Jeffrey A. Spivak  
4 JEFFREY A. SPIVAK  
Assistant United States Attorney

6 Dated: March 20, 2025

By: /s/ Roger Ponce  
7 ROGER PONCE  
Attorney for Defendant  
8 KYLE LISMAN  
(approved via email 3/20/2025)

10 IT IS SO ORDERED.

12 Dated: March 21, 2025

/s/ Eric P. Grogg  
UNITED STATES MAGISTRATE JUDGE